1 2 3 4	PAUL B. SALVATY (State Bar No. 1715) PSalvaty@winston.com WINSTON & STRAWN LLP 333 S. Grand Ave., 38th Fl. Los Angeles, CA 90071-1543 Telephone: (213) 615-1700 Facsimile: (213) 615-1750	507)	
5 6 7 8	ABBE DAVID LOWELL (pro hac vice for AbbeLowellPublicOutreach@winston.com WINSTON & STRAWN LLP 1901 L St., N.W. Washington, D.C. 20036-3508 Telephone: (202) 282-5000 Facsimile: (202) 282-5100	orthcoming)	
9 10 11 12 13 14	Bryan M. Sullivan, State Bar Number 209 bsullivan@earlysullivan.com Zachary C. Hansen, State Bar Number 32: zhansen@earlysullivan.com EARLY SULLIVAN WRIGHT GIZER & McRAE LLP 6420 Wilshire Boulevard, 17th Floor Los Angeles, California 90048 Telephone: (323) 301-4660 Facsimile: (323) 301-4676 Attorneys for PLAINTIFF ROBERT HUNTER BIDEN		
16	UNITED STATES	DISTRICT COU	RT
17	CENTRAL DISTRIC	CT OF CALIFOR	RNIA
18	WESTERN	DIVISION	
19	ROBERT HUNTER BIDEN, an individual,	Case No. 2:23-c	v-09430-SVW-PD
20	Plaintiff,	JOINT TRIAL	EXHIBIT LIST
21	VS.	Pretrial Conference:	November 25, 2024
22	PATRICK M. BYRNE, an individual,	Time:	3:00 p.m.
23	Defendant.	Jurv Trial Time:	December 10. 2024 9:00 a.m.
24			7 70 0 111111
25		Judge: Hon. Sto Ctrm. 10A	ephen V. Wilson,
26			
27			
EARLY 28			
SULLIVAN WRIGHT GIZER &	5792647.3		

JOINT TRIAL EXHIBIT LIST

GIZER & MCRAE LLP ATTORNEYS AT LAW

Pursuant to Fed. R. Civ. P. 16 and Local Rule 16-2.3, Plaintiff Robert Hunter Biden ("Plaintiff") and Defendant Patrick Byrne ("Defendant") set forth the following proposed exhibits for trial. Plaintiff and Defendant expressly reserve the right to amend the Joint Trial Exhibit List to add documents obtained as a result of any additional discovery and as may be necessary for impeachment, rebuttal, or otherwise based upon the evidence adduced at trial.

Case Title: Robert Hunter Biden v. Patrick M. Byrne

Case No: 2:23-cv-09430-SVW-PD

_	<u> </u>		
Ex.	<u>Description</u>	Date	<u>Date</u>
<u>No.</u>		Identified	<u>Admitted</u>
1.	Capitol Times Magazine, Issue 1,		
	published on June 27, 2023 (RHB00001-		
	99)		
2.	Telegram post by Defendant Patrick Byrne		
	on March 20, 2022, including associated		
	comments (RHB00695)		
3.	Telegram post by Defendant Patrick Byrne		
	on April 7, 2022, including associated		
	comments (RHB00696)		
4.	Telegram post by Defendant Patrick Byrne		
	on October 20, 2022 reposting post from		
	Qtime Network, including associated		
	comments (RHB00697)		
5.	Telegram post by Defendant Patrick Byrne		
	on December 12, 2022, including		
	associated comments (RHB00698)		
6.	X post by Defendant Patrick Byrne on		
	1. 2. 3. 5.	Ex. Description No. 1. Capitol Times Magazine, Issue 1, published on June 27, 2023 (RHB00001-99) 2. Telegram post by Defendant Patrick Byrne on March 20, 2022, including associated comments (RHB00695) 3. Telegram post by Defendant Patrick Byrne on April 7, 2022, including associated comments (RHB00696) 4. Telegram post by Defendant Patrick Byrne on October 20, 2022 reposting post from Qtime Network, including associated comments (RHB00697) 5. Telegram post by Defendant Patrick Byrne on December 12, 2022, including associated comments (RHB00698)	Description Date Identified

5792647.3

1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.		Identified	Admitted
3		January 5, 2023, including associated		
4		comments (RHB00718)		
5	7.	X post by Defendant Patrick Byrne on		
6		January 7, 2023, including associated		
7		comments (RHB00721)		
8	8.	X post by Defendant Patrick Byrne on		
9		February 10, 2023, including associated		
10		comments (RHB00699)		
11	9.	X post by Defendant Patrick Byrne on		
12		February 12 2023, including associated		
13		comments (RHB00700)		
14	10.	X post by Defendant Patrick Byrne on		
15		February 24, 2023, including associated		
16		comments (RHB00701)		
17	11.	X post by Defendant Patrick Byrne on		
18		March 17, 2023, including associated		
19		comments (RHB00100, RHB00702)		
20	12.	X post by Defendant Patrick Byrne on		
21		March 28, 2023 (RHB00110, 150)		
22	13.	X post by Defendant Patrick Byrne on		
23		April 17, 2023, including associated		
24		comments (RHB00716)		
25	14.	X post by Defendant Patrick Byrne on		
26		May 10, 2023, including associated		
27		comments (RHB00720)		
28				

1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.	=	<u>Identified</u>	<u>Admitted</u>
3	15.	Screenshot of link to Defendant Patrick		
4		Byrne's May 10, 2023 interview on <i>The</i>		
5		Absolute Truth with Emerald Robinson		
6		(RHB00186)		
7	16.	Screenshot of link to Defendant Patrick		
8		Byrne's May 11, 2023 interview on The		
9		Absolute Truth with Emerald Robinson		
10		(RHB00187)		
11	17.	Transcript of Defendant Patrick Byrne's		
12		May 11, 2023 interview on The Absolute		
13		Truth with Emerald Robinson		
14		(RHB00711-RHB00715)		
15	18.	X post by Defendant Patrick Byrne on		
16		May 12, 2023, including associated		
17		comments (RHB00101, 104)		
18	19.	X post by Defendant Patrick Byrne on		
19		May 12, 2023, including associated		
20		comments (RHB00102-103, 112-117,		
21		119)		
22	20.	Telegram post by Defendant Patrick Byrne		
23		on June 24, 2023, including associated		
24		comments (RHB00703)		
25	21.	X post by Defendant Patrick Byrne on		
26		June 25, 2023, including associated		
27		comments (RHB00719)		
28				

1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.		Identified	<u>Admitted</u>
3	22.	Telegram post by Defendant Patrick Byrne		
4		on June 27, 2023, including associated		
5		comments (RHB00151-152)		
6	23.	Telegram post by Defendant Patrick Byrne		
7		on June 27, 2023, including associated		
8		comments (RHB00153-155)		
9	24.	Telegram post by Defendant Patrick Byrne		
10		on June 28, 2023, including associated		
11		comments (RHB00157)		
12	25.	X post by Defendant Patrick Byrne on		
13		June 29, 2023, including associated		
14		comments (RHB00105-106)		
15	26.	Telegram posts by Defendant Patrick		
16		Byrne on July 4, 2023, including		
17		associated comments (RHB00156)		
18	27.	Telegram post by Defendant Patrick Byrne		
19		on July 5, 2023, including associated		
20		comments (RHB00158-161)		
21	28.	Telegram post by Defendant Patrick Byrne		
22		on July 6, 2023, including associated		
23		comments (RHB00162)		
24	29.	Telegram post by Defendant Patrick Byrne		
25		on July 21, 2023, including associated		
26		comments (RHB00163-164)		
27	30.	Screenshot of link to Defendant Patrick		
28				



1	Ex.	Description	Date	<u>Date</u>
2	No.		Identified	Admitted
3		Byrne's July 21, 2023 interview with Alex		
4		Jones on The Alex Jones Show		
5		(RHB00185)		
6	31.	Transcript of Defendant Patrick Byrne's		
7		July 21, 2023 interview with Alex Jones		
8		on The Alex Jones Show (RHB00722-		
9		RHB00789)		
10	32.	Telegram post by Defendant Patrick Byrne		
11		on July 22, 2023, including associated		
12		comments (RHB00167)		
13	33.	Telegram post by Defendant Patrick Byrne		
14		on July 28, 2023, including associated		
15		comments (RHB00168)		
16	34.	Screenshot of link to Defendant Patrick		
17		Byrne's September 8, 2023 interview on		
18		The Courtenay Turner Podcast, Episode		
19		305: Behind the Testimony of America's		
20		#1 Domestic Extremist w/ Patrick Byrne		
21		(RHB00184)		
22	35.	Transcript of Defendant Patrick Byrne's		
23		September 8, 2023 interview on The		
24		Courtenay Turner Podcast, Episode 305:		
25		Behind the Testimony of America's #1		
26		Domestic Extremist w/ Patrick Byrne		
27		(RHB00790-RHB00846)		
28	L.	<u> </u>		

1	Ex.	Description	Date	Date
2	No.		<u>Identified</u>	Admitted
3	36.	Telegram post by Defendant Patrick Byrne		
4		on September 17, 2023, including		
5		associated comments (RHB00169)		
6	37.	X post by Defendant Patrick Byrne on		
7		October 8, 2023 (RHB00147; Pg. 3 of		
8		Exhibit B to Plaintiff's Complaint)		
9	38.	X post by Defendant Patrick Byrne on		
10		October 8, 2023, including associated		
11		comments (RHB00146; Pg. 2 of Exhibit B		
12		to Plaintiff's Complaint)		
13	39.	X post by Rep. Eric Swalwell on October		
14		8, 2023, including associated comments		
15		(RHB00143-145)		
16	40.	X post by @AzPinkLady on October 11,		
17		2023, including associated comments		
18		(RHB00125-126)		
19	41.	X post by @AzPinkLady on October 11,		
20		2023, including associated comments		
21		(RHB00128)		
22	42.	X post by Defendant Patrick Byrne on		
23		October 17, 2023, including associated		
24		comments (RHB00141-142)		
25	43.	X post by Defendant Patrick Byrne on		
26		October 17, 2023, including associated		
27		comments (RHB00148)		
28				



6 JOINT TRIAL EXHIBIT LIST

1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.	<u>= 5222-k 122-</u>	<u>Identified</u>	<u>Admitted</u>
3	44.	X post by Defendant Patrick Byrne on		
4		October 23, 2023, including associated		
5		comments (RHB00109)		
6	45.	October 26, 2023 Demand for Retraction		
7		Letter to Defendant Patrick Byrne, sent by		
8		Plaintiff's counsel of record (RHB00404-		
9		406)		
10	46.	X post by Defendant Patrick Byrne on		
11		November 9, 2023, including associated		
12		comments (RHB00124, 149)		
13	47.	X post by Defendant Patrick Byrne on		
14		November 9, 2023, including associated		
15		comments (RHB00102-103, 112-117,		
16		119)		
17	48.	Truth Social post by @RickRichGuillot on		
18		November 9, 2023, including associated		
19		comments (RHB00171)		
20	49.	X post by Defendant Patrick Byrne on		
21		November 10, 2023, including associated		
22		comments (RHB00118, 137)		
23	50.	X post by Defendant Patrick Byrne on		
24		November 13, 2023, including associated		
25		comments (RHB00108, 132)		
26	51.	Screenshot of link to Defendant Patrick		
27		Byrne's November 13, 2023 interview		
28				



1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.	<u> </u>	<u>Identified</u>	Admitted
3		with Roger Stone on his podcast <i>The</i>		
4		StoneZONE with Roger Stone, titled "Sued		
5		by Hunter Biden Former Overstock CEO		
6		Patrick Byrne Enters the StoneZONE"		
7		(RHB00183)		
8	52.	Transcript of Defendant Patrick Byrne's		
9		November 13, 2023 interview with Roger		
10		Stone on his podcast <i>The StoneZONE with</i>		
11		Roger Stone, titled "Sued by Hunter Biden		
12		Former Overstock CEO Patrick Byrne		
13		Enters the StoneZONE" (RHB00847-		
14		RHB00864)		
15	53.	X post by @AzPinkLady on November		
16		14, 2023, including associated comments		
17		(RHB00129-131)		
18	54.	Telegram post by Defendant Patrick Byrne		
19		on December 5, 2023, including		
20		associated comments (RHB00166)		
21	55.	Transcript from George Berges' January 9,		
22		2024 Congressional Transcribed Interview		
23		with the House Committee on Oversight		
24		and Accountability and House Committee		
25		on the Judiciary (RHB00266-403)		
26	56.	January 9, 2024 Letter to Rep James		
27		Comer, Chairman of the House Committee		
28				

1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.		<u>Identified</u>	<u>Admitted</u>
3		on Oversight and Accountability, and Rep.		
4		Jim Jordan, Chairman of the House		
5		Committee on the Judiciary, from William		
6		Pittard, counsel for George Berges		
7		(RHB00407-410)		
8	57.	X post by @AzPinkLady on January 11,		
9		2024 (RHB00134)		
10	58.	X post by @AzPinkLady on January 11,		
11		2024 (RHB00135)		
12	59.	X post by Senator mark Kelly on January		
13		11, 2024, including associated comments		
14		(RHB00136)		
15	60.	Telegram post by Scott Adams on		
16		February 4, 2024, including associated		
17		comments (RHB00165)		
18	61.	Truth Social post by Defendant Patrick		
19		Byrne on February 13, 2024, including		
20		associated comments (RHB00170)		
21	62.	Truth Social post by Defendant Patrick		
22		Byrne on February 22, 2024, including		
23		associated comments (RHB00172)		
24	63.	Text Thread between Defendant Patrick		
25		Byrne and Anil Anwar between March 16,		
26		2024 to April 16, 2024 (Byrne_0000021)		
27	64.	April 1, 2024 Affidavit of John Moynihan		
28		<u> </u>		



1	Ex.	<u>Description</u>	Date	Date
2	<u>No.</u>		Identified	Admitted
3		(Byrne_000001-3)		
4	65.	X post by Defendant Patrick Byrne on		
5		April 8, 2024, including associated		
6		comments (RHB00717)		
7	66.	X post by Defendant Patrick Byrne on		
8		April 25, 2024 (RHB00107)		
9	67.	X post by @AzPinkLady on April 25,		
10		2024, including associated comments		
11		(RHB00127)		
12	68.	Telegram post by Defendant Patrick Byrne		
13		on June 5, 2024, including associated		
14		comments (RHB00704)		
15	69.	X post by @AzPinkLady on June 30, 2024		
16		(RHB00133)		
17	70.	X post by Defendant Patrick Byrne on July		
18		22, 2024, including associated comments		
19		(RHB00138-140)		
20	71.	August 9, 2024, Defendant Patrick		
21		Byrne's verified Further Responses to		
22		Plaintiff's Interrogatories, Set One		
23	72.	September 5, 2024, Defendant Patrick		
24		Byrne's Responses to Plaintiff's		
25		Interrogatories, Set Two		
26	73.	September 5, 2024, Defendant Patrick		
27		Byrne's Responses to Plaintiff's		
28	L			

1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.		Identified	Admitted
3		Interrogatories, Set Three		
4	74.	September 9, 2024, emails between		
5		Plaintiff's counsel of record and Jared		
6		Roberts, attorney for Ret. Lt. Gen. Michael		
7		Flynn (RHB00506-508)		
8	75.	September 17, 2024, Defendant Patrick		
9		Byrne's Further Responses to Plaintiff's		
10		Requests for Production of Documents,		
11		Set One		
12	76.	September 19, 2024, Defendant Patrick		
13		Byrne's verified Further Responses to		
14		Plaintiff's Requests for Admissions, Set		
15		One		
16	77.	September 19, 2024, Defendant Patrick		
17		Byrne's Further Responses to Plaintiff's		
18		Requests Admissions, Set Two		
19	78.	September 19, 2024 Letter to Capitol		
20		Times Media LLC from Plaintiff's counsel		
21		of record (RHB00445-505)		
22	79.	Telegram post by Defendant Patrick Byrne		
23		on October 7, 2024, including associated		
24		comments (RHB00705)		
25	80.	October 10, 2024, Defendant Patrick		
26		Byrne's Further Responses to Plaintiff's		
27		Requests for Production of Documents,		
28				

1	Ex.	Description	Date	Date
2	No.		Identified	Admitted
3		Set Three		
4	81.	October 10, 2024, Defendant Patrick		
5		Byrne's Further Responses to Plaintiff's		
6		Requests for Production of Documents,		
7		Set Four		
8	82.	X post by Defendant Patrick Byrne on		
9		October 26, 2024, including associated		
10		comments (RHB00706)		
11	83.	October 29, 2024 Screenshot of Defendant		
12		Patrick Byrne's X Profile (RHB00707)		
13	84.	October 29, 2024 Screenshot of website		
14		enemywithindocuseries.com (RHB00708)		
15	85.	October 29, 2024 Screenshot of Defendant		
16		Patrick Byrne's book, The Deep Rig: How		
17		Election Fraud Cost Donal J. Trump the		
18		White House, By a Man Who did not Vote		
19		for Him: (or what to send friends who ask		
20		"Why do you doubt the integrity of		
21		Election 2020", for sale on Amazon.com		
22		(RHB00710)		
23	86.	October 29, 2024 Screenshot of Defendant		
24		Patrick Byrne's book, Danger Close:		
25		Domestic Extremist #1 Comes Clean, for		
26		sale on Amazon.com (RHB00709)		
27	87.	Defendant Patrick Byrne's book, Danger		
28	L			

1	Ex.	Description	Date	<u>Date</u>
2	No.		Identified	Admitted
3		Close: Domestic Extremist #1 Comes		
4		Clean, published on February 15, 2024		
5		(RHB00509-RHB00694)		
6	88.	Truth Social post by @TXFreedom4Ever		
7		in 2023 (exact date unknown), including		
8		associated comments (RHB00173)		
9	89.	Truth Social post by @DEFCONMarine		
10		in 2023 (exact date unknown), including		
11		associated comments (RHB00178)		
12	90.	Truth Social post by @RealRogerStone in		
13		2023 (exact date unknown), including		
14		associated comments (RHB00179)		
15	91.	Truth Social post by @AgnesBenko in		
16		2023 (exact date unknown), including		
17		associated comments (RHB00180)		
18	92.	Truth Social post by @cziggy218 in 2023		
19		(exact date unknown), including		
20		associated comments (RHB00181)		
21	93.	Truth Social post by @nancydunks in		
22		2023 (exact date unknown), including		
23		associated comments (RHB00182)		
24	94.	Truth Social post by Defendant Patrick		
25		Byrne in 2024 (exact date unknown),		
26		including associated comments		
27		(RHB00174)		
28				

1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.		Identified	Admitted
3	95.	Truth Social post by Defendant Patrick		
4		Byrne in 2024 (exact date unknown),		
5		including associated comments		
6		(RHB00176)		
7	96.	Truth Social post by Defendant Patrick		
8		Byrne in 2024 (exact date unknown),		
9		including associated comments		
10		(RHB00170)		
11	97.	Truth Social post by Defendant Patrick		
12		Byrne in 2024 (exact date unknown),		
13		including associated comments		
14		(RHB00175)		
15	98.	Remittance Advance Invoice from Simon		
16		& Schuster UK Ltd., dated September 4,		
17		2021 (RHB00411)		
18	99.	Royalty Statements from Simon &		
19		Schuster from March 2020 through		
20		September 2024 (RHB00412-443)		
21	100	Royalty Ledger from Book/Lab Literary		
22		Agency (date unknown) (RHB00444)		
23	101	Hunter Biden Beautiful Things Press Kit		
24		(RHB00189-265)		
25	102	Audio Recording produced by Defendant		
26		in Discovery on August 27, 2024 titled		
27		"HIGHLY CONFIDENTIAL – AUDIO-		
28				

1	Ex.	<u>Description</u>	<u>Date</u>	<u>Date</u>
2	No.		Identified	<u>Admitted</u>
3		2021-08-15-10-07-25"		
4	103	Transcript of Audio Recording produced		
5		by Defendant in Discovery on August 27,		
6		2024 titled "HIGHLY CONFIDENTIAL		
7		- AUDIO-2021-08-15-10-07-25"		
8		(RHB00865)		
9	104	Audio Recording produced by Defendant		
10		in Discovery on August 27, 2024 titled		
11		"HIGHLY CONFIDENTIAL – AUDIO-		
12		2021-08-24-08-46-17"		
13	105	Transcript of Audio Recording produced		
14		by Defendant in Discovery on August 27,		
15		2024 titled "HIGHLY CONFIDENTIAL		
16		- AUDIO-2021-08-24-08-46-17"		
17		(RHB00866)		
18	106	Audio Recording produced by Defendant		
19		in Discovery on August 27, 2024 titled		
20		"HIGHLY CONFIDENTIAL – AUDIO-		
21		2021-08-24-14-43-38"		
22	107	Transcript of Audio Recording produced		
23		by Defendant in Discovery on August 27,		
24		2024 titled "HIGHLY CONFIDENTIAL		
25		– AUDIO-2021-08-24-14-43-38"		
26		(RHB00867-RHB00868)		
27	108	Defendant's passport photographs		
28				

1	Ex.	<u>Description</u>	Date	<u>Date</u>
2	<u>No.</u>		Identified	Admitted
3		produced by Defendant in discovery on		
4		November 4, 2024 (Byrne_0000024-		
5		Byrne_0000045)		
6	109	Defendant's "medical notes" provided by		
7		Defendant via email on November 4, 2024		
8	600.	Defendant Patrick Byrne's Notice of		
9		Taking of Deposition of Plaintiff Robert		
10		Hunter Biden (Deposition of Robert		
11		Hunter Biden taken on 08/16/2024)		
12	601.	Plaintiff's Objections to Defendant's		
13		Amended Notice of Deposition of Plaintiff		
14		Robert Hunter Biden (Deposition of		
15		Robert Hunter Biden taken on 08/16/2024)		
16	602.	Plaintiff Robert Hunter Biden's Rule 26		
17		Supplemental Disclosures (Deposition of		
18		Robert Hunter Biden taken on		
19		08/16/2024)		
20	603.	Plaintiff Robert Hunter Biden's		
21		Responses to Defendant Patrick M.		
22		Byrne's First Set of Interrogatories		
23		(Deposition of Robert Hunter Biden taken		
24		on 08/16/2024)		
25	604.	Stipulation for Protective Order and		
26		Order (Deposition of Robert Hunter		
27		Biden taken on 08/16/2024)		
28				

1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.		Identified	Admitted
3	605.	Complaint for Damages for Defamation		
4		(Deposition of Robert Hunter Biden taken		
5		on 08/16/2024)		
6	606.	Affidavit dated April 1, 2024 (Deposition		
7		of Robert Hunter Biden taken on		
8		08/16/2024)		
9	607.	U.S. Senate Committee on Finance		
10		Majority Staff Report (Deposition of		
11		Robert Hunter Biden taken on		
12		08/16/2024)		
13	608.	The Government's Motions In Limine		
14		(Deposition of Robert Hunter Biden taken		
15		on 08/16/2024)		
16	609.	New York Post article entitled Smoking-		
17		gun email reveals how Hunter Biden		
18		introduced Ukrainian businessman to VP		
19		dad (Deposition of Robert Hunter Biden		
20		taken on 08/16/2024)		
21	610.	Independent article entitled Not many		
22		people are buying Hunter Biden's new		
23		book (Deposition of Robert Hunter Biden		
24		taken on 08/16/2024)		
25	611.	New York Post article entitled Hunter		
26		Biden's drug- and sex-fueled memoir is a		
27				

1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.	<u> </u>	<u>Identified</u>	<u>Admitted</u>
3		big fat flop (Deposition of Robert Hunter		
4		Biden taken on 08/16/2024)		
5	612.	Screenshot of an Amazon page for the		
6		book Laptop from Hell: Hunter Biden,		
7		Big Tech, and the Dirty Secrets the		
8		President Tried to Hide (Deposition of		
9		Robert Hunter Biden taken on		
10		08/16/2024)		
11	613.	National Security article entitled Analysis		
12		of Hunter Biden's hard drive show he, his		
13		firm took in about \$11 million from 2013		
14		to 2018, spent it fast (Deposition of		
15		Robert Hunter Biden taken on		
16		08/16/2024)		
17	614.	Article entitled The Sordid Saga of		
18		Hunter Biden's Laptop (Deposition of		
19		Robert Hunter Biden taken on		
20		08/16/2024)		
21	615.	Article entitled Republican Claims About		
22		Hunter Biden Offenses (Deposition of		
23		Robert Hunter Biden taken on		
24		08/16/2024)		
25	616.	The Irish Times article entitled Hunter		
26		Biden, the 'big guy' and whether		
27		allegations of corruption represent a		
28	<u> </u>			

1	Ex.	Description	<u>Date</u>	Date
2	No.		<u>Identified</u>	Admitted
3		scandal or a smear (Deposition of Robert		
4		Hunter Biden taken on 08/16/2024)		
5	617.	CBC News article entitled The scandals		
6		swirling around Hunter Biden - what we		
7		know, what we don't, and what's next		
8		(Deposition of Robert Hunter Biden taken		
9		on 08/16/2024)		
10	618.	Press Release entitled Comer, Greene		
11		Renew Request to DOJ on Mishandling		
12		of Hunter Biden Victims' Rights		
13		(Deposition of Robert Hunter Biden taken		
14		on 08/16/2024)		
15	619.	Article entitled Hunter Biden's universe		
16		of legal problems, briefly explained		
17		(Deposition of Robert Hunter Biden taken		
18		on 08/16/2024)		
19	620.	Indictment for Case No. 23-00061-MN		
20		(Deposition of Robert Hunter Biden taken		
21		on 08/16/2024)		
22	621.	New York Post article entitled Biden has		
23		a secret, illegal deal with Iran that gives		
24		mullahs everything they want (Deposition		
25		of Robert Hunter Biden taken on		
26		08/16/2024)		
27	-			

1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.		Identified	Admitted
3	622.	Fox News article entitled Hunter Biden		
4		took thousands from daughter's college		
5		fund for 'hookers and drugs': report		
6		(Deposition of Robert Hunter Biden taken		
7		on 08/16/2024)		
8	623.	Indictment for Case No. 2:23-cr-00599-		
9		MCS (Deposition of Robert Hunter Biden		
10		taken on 08/16/2024)		
11	624.	National Review article entitled The		
12		Indefensible, Shameless, Sordid Hunter		
13		Biden (Deposition of Robert Hunter		
14		Biden taken on 08/16/2024)		
15	625.	CNN Politics article entitled Hunter		
16		Biden's universe of legal problems,		
17		briefly explained (Deposition of Robert		
18		Hunter Biden taken on 08/16/2024)		
19	626.	The New York Times article entitled A		
20		Timeline of Hunter Biden's Life and		
21		Legal Troubles (Deposition of Robert		
22		Hunter Biden taken on 08/16/2024)		
23	627.	Marco Polo file BidenLaptopMedia.com		
24		(Deposition of Robert Hunter Biden taken		
25		on 08/16/2024)		
26				



1	Ex.	<u>Description</u>	<u>Date</u>	<u>Date</u>
2	No.		Identified	Admitted
3	628.	Marco Polo Report on the Biden Laptop		
4		(Deposition of Robert Hunter Biden taken		
5		on 08/16/2024)		
6	629.	Defendant's Document Production		
7		(Byrne_000001-Byrne_000009) served		
8		on 08/27/2024		
9	630.	Defendant's Document Production		
10		(Byrne_000010-Byrne_000020) served		
11		on 10/15/2024		
12	631.	Defendant's Document Production		
13		(Byrne_000021) served on 10/15/2024		
14	632.	Defendant's Document Production		
15		(Byrne_000022-Byrne_000023) served		
16		on 10/16/2024		
17	633	Passport Pages for Byrne (Byrne 24 to		
18		25)		
19	634	Tapes 2021		
20				
21	635	Affidavit of Moynihan (Byrne 1-3)		
22				
23	635	Byrne Amex Travel Documents (Byrne		
24		10-20)		
25	636	Assistant Secretary of State Letter		
26		8/26/11 (Byrne 4)		
27	637	Airline Itinerary Documents (Byrne 7-9)		
28	L			



1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.		Identified	<u>Admitted</u>
3				
4	638	Complaint in Biden v. Ziegler Case No.:		
5		2.23-cv-07591 (Rule 26f Disc 9/30/24)		
6	639	Complaint in Biden v. Giuliana Case No.:		
7		2.23-cv-8032 (Rule 26f Disc 9/30/24		
8	640	Complaint Issac v. Biden Case No.:		
9		822C-10-012-CAK (Rule 26f Disc		
10		9/30/24)		
11	641	US Senate Report on Corruption (Exh		
12		620 Biden Deposition) Rule 26f Disc		
13		9/30/24		
14	642	Motions in Limine Patrick Ho Case (Exh		
15		621 Biden Deposition) Rule 26f Discl		
16		9/30/24		
17	643	Book Laptop from Hell by Miranda		
18		Devine ;Rule 26f Discl 9/30/24		
19	644	Gun Case Indictment- Exh 633 to Biden		
20		Deposition; Rule 26f Disc 9/30/24		
21	645	Tax Case Indictment -Exh 638 to Biden		
22		Deposition; Rule 26f Disc 9/30/24		
23	646	Jury Verdict Gun Case; Rule 26f Discl		
24		9/3024		
25	647	Dr. Nathan E. Lavin MD Report dated		
26		October 29, 2024, produced to plaintiff's		
27				

1	Ex.	Description	<u>Date</u>	<u>Date</u>
2	No.		Identified	<u>Admitted</u>
3		counsel per stipulation and order for IME;		
4		Rule 26f Discl 9/30/24		
5	648	Report on The Biden Laptop published by		
6		Marco Polo; Rule 26f Discl 9/30/24		
7	649	Patrick Ho Sanction; Rule 26f Discl		
8		9/30/24		
9	650	Article: Hunter Biden took Daughter's		
10		College Money-Exh 635 to Biden		
11		Deposition; Rule 26f Discl 9/30/24		
12	651	Article on Hunter Biden's Lawsuit; Rule		
13		26f Disc 9/30/24		
14	652	Article on Hunter Biden Art Sales; Rule		
15		26f Discl dated 9/30/24		
16	653	Press Kit-Exh 609 to Deposition of		
17		Biden; Rule 26f Discl 9/30/24		
18	654	Press Kit-Exh 610 to Biden Deposition;		
19		Rule 26f Discl 9/3024		
20	655	Podcasts-Exh 611 to Biden Deposition;		
21		Rule 26f Discl 9/30/24		
22	656	International Press-Exh 612 to Biden		
23		Deposition; Rule 26f Dlscl 9/30/24		
24	657	NY Post Article on Burisma; Exh 622 to		
25		Biden Deposition; Rule 26f Discl 9/30/24		
26	658	Article on Biden's book sales; Exh 623 to		
27		Biden Deposition; Rule 26f Discl 9/30/24		
28		<u> </u>		

1	Ex.	Description	Date	Date
2	No.		<u> </u>	<u>Admitted</u>
3	659	Article on Biden's Book; Exh 624 Biden		
4		Deposition; Rule 26f Discl 9/30/24		
5	660	Laptop from Hell Screen Shot; Exh 625		
6		to Biden Deposition; Rule 26f Discl		
7		9/30/24		
8	661	Analysis of Biden laptop and payments;		
9		Exh 626 to Biden Deposition; Rule 26f		
10		Discl 9/30/24		
11	662	Biden Laptop Article, Exh. 627 to Biden		
12		Deposition; Rule 26f Discl. 9/30/24		
13	663	Scandal Article; Exh 629 to Biden		
14		Deposition; Rule 26f Dlscl 9/30/24		
15	664	Scandal Article; Exh 630 to Biden		
16		Deposition; Rule 26f Discl 9/30/24		
17	665	Article on Biden's Legal Problems; Exh		
18		632 to Biden Deposition; Rule 26f		
19		Disclosure		
20	666	Article on Shameless Biden; Exh. 639 to		
21		Biden Deposition; Rule 26f Discl 9/30/24		
22	667	Article on Biden Legal Problems; Exh.		
23		640 to Biden Deposition; Rule 26f Discl		
24		9/30/24		
25	668	Marco Polo Pub on Biden File; Rule 26		
26		Discl 9/30/24		
27				

Ex.	<u>Description</u>	<u>Date</u>	<u>Date</u>
No.		<u>Identified</u>	<u>Admitted</u>
669	Marco Polo Report on Biden; Exh 654 to		
	Biden Deposition; Rule 26f Discl 9/30/24		
670	Article on Biden Law License		
	Suspended; Rule 26f Discl 9/30/24		
671	Article on Romanian Influence Peddling		
	by Biden; Rule 26f Discl 9/30/24		
		_	

Defendant reserves the right to request that the court permit the List of Exhibits to be amended to allow for additional exhibits to be included in the list pursuant to Federal Rule of Civil Procedure Section 16(e). Defendant also reserves pursuant to the right to pursuant to Federal Rule of Civil Procedure 16-2.3 to use impeachment exhibits that are not included on the Joint Exhibit List during the trial of this case.

Dated: November 5, 2024 EARLY SULLIVAN WRIGHT GIZER & MCRAE LLP

By: /s/ Zachary C. Hansen

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